



Log # TXX-92215
File # 10068

TU ELECTRIC April 27, 1992

William J. Cahill, Jr.
Group Vice President

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20545

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES) - UNIT 2
DOCKET NO. 50-446
VALIDATION EFFORTS FOR CPSES UNIT 2

Gentlemen:

In a meeting held on January 9, 1992, the NRC staff discussed the value of a comprehensive explanation of how the Corrective Action Program (CAP), for Unit 1 and areas common and Unit 1 and 2, was being applied to Unit 2 and a discussion of the accuracy for Unit 2 of the Safety Evaluation Report Supplements (SSERs) which were prepared for CAP. Enclosed is the report entitled "Validation Efforts for CPSES Unit 2" which addresses these items.

The report reveals no significant issues. The NRC has been kept properly informed of CPSES Unit 2 activities and these activities have been consistent with TU Electric commitments. This document represents a one time effort to consolidate this information and it is not our intention to update this report.

Since approval of the report on April 13, 1992, two additional items have been identified which should have been discussed. The first is an additional difference with SSER 14 which should have been discussed in Section 7.1.2 of the report. Page 74 of Appendix A in SSER 14 states that seismically analyzing non-seismic piping is limited to only those piping systems located in seismically analyzed buildings. In TU Electric letter TXX-92063 dated March 4, 1992, an advance FSAR change was submitted to the NRC to reclassify a portion of the Steam Generator Blowdown piping and pipe supports in the Turbine Building from non-seismic to seismic Category II. The piping and piping supports are completely supported by seismic Category I walls. This item was missed by the enclosed report because the letter was in preparation at the same time that the SSER reviews were being performed.

The second item provides an expanded discussion of IE Bulletin 79-14 reconciliation as presented near the end of Section 7.1.1 of the enclosed report. This reconciliation either is performed at the end of the process based upon the results of 79-14 walkdowns, or is performed during preparation of stress analyses using a combination of as-built and as-designed data (with a review of subsequent installations to ensure that the as-designed data are consistent with the subsequent as-built installations).

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TU Electric will continue to keep the NRC informed of future Unit 2 activity as appropriate via normal means (e.g., TU Electric letters, FSAR amendments, etc.). If you have any questions, contact Donald R. Woodlan at (214) 812-8225.

Sincerely,



William J. Cahill, Jr.

DRW/grp
Enclosure

c - Mr. R. D. Martin, Region IV
Resident Inspectors (2)
Mr. B. E. Holian, NRR